



CDSS

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**DEPARTMENT OF SOCIAL SERVICES**  
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ARNOLD SCHWARZENEGGER  
GOVERNOR

February 11, 2009

Ms. Jean Shepard, Director  
San Diego County Health & Human Services Agency  
1700 Pacific Hwy, Rm. 207  
San Diego, CA 92101

Dear Ms. Shepard:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of San Diego County Health & Human Services Agency. Enclosed is the final report on the review.

There were some compliance issues (deficiencies) identified in the report, which will require the development of a corrective action plan (CAP). Please submit your CAP within sixty days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the attached report.

We will provide a copy of our report to any individual who makes a Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it too, becomes a public document.

If you need technical assistance in the development of your CAP, please feel free to contact the Civil Rights Bureau at (916) 654-2107 (voice) / (916) 654-2098 (TDD). You may also contact us by e-mail at [crb@dss.ca.gov](mailto:crb@dss.ca.gov).

Sincerely,

RAMÓN S. LOPEZ, Chief  
Civil Rights Bureau  
Human Rights and Community Services Division

Enclosure

c: Jennifer Cooke, Civil Rights Coordinator

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT**  
**FOR**  
**San Diego County Health & Human Services Agency**  
**Conducted**  
**October 6-9, 2008**

**California Department of Social Services**  
**Human Rights and Community Services Division**  
**Civil Rights Bureau**  
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**Reviewer**  
**Elsa Garcia**

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## **CIVIL RIGHTS COMPLIANCE REVIEW REPORT**

### **I. INTRODUCTION**

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the San Diego County Health & Human Services Agency with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on October 6-9, 2006 with an exit meeting held on October 9, 2008 to review the findings.

The review was conducted in the following locations:

<b>Name of Facility</b>	<b>Address</b>	<b>Programs</b>	<b>Non-English languages spoken by a substantial number of clients (5% or more)</b>
North Coastal Family Resource Center	1315 Union Plaza Court, Oceanside	<b>NAFS, CalWORKS</b>	Spanish
Child Welfare Services North Coastal	1320 Union Plaza Court, Oceanside	<b>Children's Services – Emergency Response/CPS</b>	Spanish
Family Resource Center – Metro	1130 10 <sup>th</sup> Avenue, San Diego	<b>NAFS</b>	Spanish
IHSS Mills Building	1255 Imperial Ave, San Diego	<b>IHSS</b>	Spanish

### **II. SUMMARY OF METHODOLOGY**

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2007-2008 Annual Civil Rights Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

#### Interviews Conducted of Public Contact Staff

<b>Classifications</b>	<b>Total</b>	<b>Bilingual</b>
Eligibility Workers	8	4
Children Social Workers	4	2
Adult Program Workers	4	2
Receptionist/Screeners	4	4
<b>Total</b>	<b>20</b>	<b>12</b>

#### Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

#### Reviewed Case Files

Total cases reviewed	116
Non-English or limited English speakers' case files reviewed	88
English speakers' case files reviewed	28
Languages of clients' cases	English, Spanish, Vietnamese, Samoan, Indonesian, Russian, Laotian, Chinese

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a declaration of overall compliance.

### III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

#### A. Findings

<b>Access to Services, Information and Outreach</b>	<b>Yes</b>	<b>No</b>	<b>Some-time`s</b>	<b>Comments</b>
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Clients can mail applications, and also make arrangements with their worker to meet their needs.
Does the county have extended hours to accommodate clients?	X			Hours are 7:15 a.m.- 5:00 p.m. clients can make arrangements with their worker to meet their need.
Can applicants access services when they cannot go to the office?	X			Clients can contact the Public Assistance Inquiry number; they can request application via phone to start mail-in process, which may include home visits for disabled clients.
Does the county ensure the awareness of available services for individuals in remote areas?	X			There are Family Resource Centers (FRCs) throughout the County.

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)?	X			At intake or initial visit client receives all paperwork.

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			The pamphlet is explained to client at intake and re-certification by the worker.
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?	X			
Was the Pub 13 available in large print, audiocassette and Braille?	X			All offices visited had the large print, audiocassette and Braille available.
Were the current versions of the required posters present in the lobbies?	X			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			Workers were aware of the location of the required posters with the Civil Rights Coordinator's name and address.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?		X		Two offices visited: 1310 10 <sup>th</sup> Avenue & 1315 North Coastal FRC did not have directional & informational signage in the threshold language (Spanish).



## B. Corrective Actions

Informational Element	Corrective Action Required
Directional signage	San Diego County Health & Human Services County shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients and that where such areas are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages. Div. 21-107.212 and .24

The most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	03/07
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact your program consultant to receive the most recent versions, or download the Pub 13 from the CRB website [http://www.dss.cahwnet.gov/civilrights/YourRights\\_498.htm](http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm).

## IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

## A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

**Facility Location:** North Coastal FRC - 1315 Union Plaza Ct, Oceanside, CA

Facility Element	Findings	Corrective Action
Route to Main Entrance	Route to main entrance needs directional signage to accessible feature (elevator).	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353
Ramps Railings	Ramp railings are too low at 32".	Handrail is mounted 34" to 38" above ramp. (CA T24 1133B.5.5.1, ADA 4.8.5(5))
Men's Restroom	Force to open door is excessive at 12lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195
Soap Dispenser	Soap dispenser is too high at 44".	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.9.2 and CA T24 1115B.9.1.2, ADA 4.19.6) p. 269
Pipes under sink	There were two sinks; one sink had pipes that were not securely insulated or covered.	Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p. 267

Women's Restroom	Force to open door is excessive at 8lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195
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**B. Observation** - Parking at this facility is shared by multiple businesses. This is one of two facilities leased by the county which is located in a court with a total of four small parking lots. Parking is designated for tenants only. However, there are two accessible parking spaces in each parking area. The security staff which is posted outside directs clients to off-street parking and if a client needs assistance with accessible parking, the security staff will direct client to appropriate accessible parking space in tenant parking lot nearest to office if available. Security staff is very helpful and visible on site. Also, main doors are kept open at all times during business hours and a security guard remains at entrance, and will assist clients in wheelchairs if needed.

**A. Findings and Corrective Actions**

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

**Facility Location:** Child Welfare Services - 1320 Union Plaza Ct, Oceanside, CA

Facility Element	Findings	Corrective Action
Route to Main Entrance	Route to main entrance needs directional signage to accessible feature (elevator).	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353
Ramps Railings	Ramp railings are too low at 32".	Handrail is mounted 34" to 38" above ramp. (CA T24 1133B.5.5.1, ADA 4.8.5(5))
Main Door	Force to open door is excessive at 12lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195

Bottom 10" of door	Bottom of door only had a 4" surface to allow door to open by wheelchair foot-rest.	The bottom 10" of all doors except automatic and sliding shall have a smooth, uninterrupted surface to allow the door to be opened by a wheelchair footrest without creating a trap or hazardous condition. (CA T24 1133B.2.6) p. 198
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**B. Observation** - Parking at this facility is shared by multiple businesses. This is the second of two facilities leased by the county which is located in a court with a total of four small parking lots. Parking is designated for tenants only. However, there are two accessible parking spaces in each parking area. The security staff which is posted outside directs clients to off-street parking and if a client needs assistance with accessible parking, the security staff will direct client to appropriate accessible parking space in tenant parking lot nearest to office if available. Security staff is very helpful and visible on site. Also, main doors are kept open at all times during business hours and a security guard remains at entrance, and will assist clients in wheelchairs if needed. The security staff will direct client to appropriate accessible parking space in tenant parking lot nearest to office if available. Security staff is very helpful and visible on site. Also, main entrance doors are kept open at all times during business hours and a security guard remains posted at entrance, and will assist clients in wheelchairs if needed.

**A. Findings and Corrective Actions**

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

**Facility Location:** Metro – 1130 10<sup>th</sup> Avenue, San Diego, CA

Facility Element	Findings	Corrective Action
Main Entrance	Abrupt change in surface level at front entrance. Surface at edge from slope is not level, causes interference with wheelchair traffic.	When change in level is greater than ½ inch the change shall be beveled. (CA T24 1133B.7.4.) p. 162
Main Door	Force to open door is excessive at 12lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195

Directional signage	In the lobby area there was some instructional signage in English for clients but not in the threshold language: Spanish.	Directional and Informational Signage should be available in threshold languages. Div 21.107-212
Unisex Restroom Door	Force to open door is excessive at 12lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195

**B. Recommendation – None**

**A. Findings and Corrective Actions**

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

**Facility Location:** 1255 Imperial Avenue, San Diego CA

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>
Main Entrance	There was no accessible signage on doors, nor directional signage directing clients to automatic doors.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353
<b>Men's Restroom</b>		
Accessible signage	There was no signage on the door.	Door sign and wall sign shall be 60" above the floor.  For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right.

		<p>(CA T24 1117B.5.7, ADA 4.30.6) p. 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263</p>
Door	Force to open door is excessive at 18lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195
<b>Women's Restroom</b>		
Accessible signage	There was no signage on the door.	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263</p>
Door	Force to open door is excessive at 12lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195

Faucet	Pipes under sink are not securely insulated.	Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p. 267
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**B. Recommendation - None**

**V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff is not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

**A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews**

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			Clients are provided with a packet of forms at intake, this includes a Language Determination Form.

Question	Yes	No	Some-times	Comments
Does the county use a primary language form?	X			Language Determination Form
Does the client self-declare on this form?	X			Client completes Language Determination Form, however if they need assistance a worker or interpreter will help them.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Clients will have a completed Language Determination Form on file and workers will arrange for an interpreter if needed.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			Workers have a liaison contact within their office to request an interpreter.
Is there a delay in providing services?		X		Bilingual workers are available immediately, however if there is a language in which a bilingual worker is not available, a request for an interpreter will be made.
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			The county has a bilingual roster and a liaison contact person at each office to request an interpreter.
Are county interpreters determined to be competent?	X			Bilingual interpreters must pass a competency test to be certified.
Does the county have adequate interpreter services?	X			Each office has adequate amount of interpreters.



Question	Yes	No	Some-times	Comments
Does the county allow minors to be interpreters? If so, under what circumstances?		X		In the only circumstance a minor would be allowed would be in an emergency or life threatening situation and it would only be to set up a subsequent appointment to have an interpreter present.
Does the county allow the client to provide his or her own interpreter?	X			A client can choose to have their own interpreter; however both must sign the release of confidential information form.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			
Does the county use the CDSS-translated forms in the clients' primary languages?	X			County encourages the use of CDSS-translated forms in the client's primary language.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			Bilingual staff will translate the information to be inserted on the NOA's also an interpreter is used if needed.
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			County has the TDD, and other resources available if needed. Staff would request services needed through their liaison.

Question	Yes	No	Some-times	Comments
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			County staff states they make every effort to assist clients with learning disabilities. If client cannot read or write, they will read them material and ensure the client understands the material being given to them.
Does the county offer screening for learning disabilities?	X			It is offered in the WTW program.
Is there an established process for offering screening?	X			In the WTW program there is a process for screening.
Is the client identified as having a learning disability referred for evaluation?	X			The county has resources available to refer if necessary.

**B. Corrective Actions – None**

**VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

**A. Findings from Case File Reviews and Staff Interviews**

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Ethnic origin documentation	County Field Sheet, ERR Form	SOC 295	DFA 285, Temp 22-44, SAWS1	DFA 285, SAWS1
Primary language documentation	Language Determination Form 2046	Language Determination Form 2046	Language Determination Form 2046	Language Determination Form 2046

<b>Documented Item</b>	<b>Children's Services</b>	<b>Adult Programs</b>	<b>CalWORKs</b>	<b>Non-Assisted Food Stamps</b>
Method of providing bilingual services and documentation	County Field Sheet, Case narrative	Case narrative & Language Determination Form 2046	Case narrative & Language Determination Form 2046 and case comments	Case narrative & Language Determination Form 2046 and case comments
Client provided own interpreter	County Field Sheet, Case narrative	Case narrative	No case found	No case found
Method to inform client of potential problem using own interpreter	County Field Sheet, Case narrative	Language Determination Form 2046 & Release of Confidential Information Form	N/A	N/A
Release of information to Interpreter	Signed Release of Confidential Information	Signed Release of Confidential Information	Signed Release of Confidential Information	Signed Release of Confidential Information
Individual's acceptance or refusal of written material offered in primary language	Language Determination Form 2046	Language Determination Form 2046	Language Determination Form 2046	Language Determination Form 2046
Documentation of minor used as interpreter	No case found	No case found	No case found	No case found
Documentation of circumstances for using minor interpreter temporarily	No case found	No case found	No case found	No case found

<b>Documented Item</b>	<b>Children's Services</b>	<b>Adult Programs</b>	<b>CalWORKs</b>	<b>Non-Assisted Food Stamps</b>
Translated notice of actions (NOA) contain translated inserts	Found in case files, Spanish translated inserts.	Case narrative	Cal Win System & case files	Cal Win System & case files
Method of identifying client's disability	County Field Sheet	Form 12-43A HHSA, case narrative	Statement of Facts	Statement of Facts
Method of documenting a client's request for auxiliary aids and services	County Field Sheet, case narrative	None found	Case narrative	None found

## **B. Corrective Actions - None**

### **I. STAFF DEVELOPMENT AND TRAINING**

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

#### **A. Findings**

<b>Interview questions</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Do employees receive continued Division 21 Training?	X			Staff interviewed state that training is ongoing and mandatory annually.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			Staff was well aware of the procedures to client's rights to file a discrimination complaint.
Does the county provide employees Cultural Awareness Training?	X			The county provides diversity training annually.

Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			CSWs interviewed stated they understood the MEPA and received ongoing training.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			Staff interviewed was aware of the predominant cultural groups in their area. Bilingual workers were available in each office.

**B. Corrective Actions -None**

**VIII. DISCRIMINATION COMPLAINT PROCEDURES**

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

**A. Findings from Staff Interviews and Program Manager Surveys**

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			All staff interviewed were able to identify the differences between all three types of complaints.
Did the employees know who the Civil Rights Coordinator is?	X			All staff interviewed knew who the civil rights coordinator was.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			All staff interviewed knew the location of the civil rights poster.

Interview and review areas	Yes	No	Some-times	Findings
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			The complaint log was complete and up to date.

**B. Corrective Action - None**

**IX. CONCLUSION**

The CDSS would like to acknowledge and thank all staff involved with the review and especially Ms. Jennifer Cooke, Civil Rights Coordinator for her outstanding coordination, assistance, and cooperation during the review. It is apparent that quality and excellence are the San Diego HHSA highest priority. The HHSA staff interviewed were found to be professional, pleasant and committed to providing superior service to their clients. Customer service is a high priority with the HHSA. Staff are to be commended for their willingness to "go the extra mile" to accommodate their clients.

San Diego HHSA was found to be in overall compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws. The civil rights program was visible in the main reception areas with translated signage, diverse staffing and an overall "climate" of participant service.

San Diego County Health & Human Services Agency must remedy the violations identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report. The plan must include a schedule by which all actions will be taken to correct the violations.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.